



NATIONAL
ASSOCIATION OF
COUNTY AND CITY
HEALTH OFFICIALS

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October 2000

Ms. Magalie Roman Salas
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Ultra-Wideband (ET Docket 98-153)

Dear Ms. Salas:

I am writing on behalf of the National Association of County and City Health Officials regarding the FCC's Notice of Proposed Rulemaking concerning Ultra-wideband (UWB) radio transmission. NACCHO is the national organization representing local public health agencies. We promote national policy, develop resources and programs, and support effective local public health practice and systems that protect and improve the health of people and communities. Our institution is vitally interested in the development of Telehealth-related technologies and applications to establish new ways of increasing access to medical services in remote and/or underserved areas.

As we migrate various applications to an Internet / Intranet environment, we are aware of the tremendous potential for high-bandwidth wireless technologies which offer the growing Telehealth field the capability of transferring very large data files between users across short distances. Ultra-wideband offers low cost, high speed wireless connectivity for LANs in the critical first or last feet within our public health facilities. UWB would enable our institutions to avoid costly and disruptive interior wiring projects and allow our public health workforce and clinicians to use a variety of monitors, PDAs, laptops and other devices in a highly mobile environment.

Increasingly, we are looking for ways to efficiently transmit surveillance data and health alert information that will ensure a quick response to critical public health needs, including bioterrorism and other emergency response threats. Furthermore, we support looking for ways to communicate electronic patient medical records -- including high resolution images -- among wireless LAN users within and/or among our facilities and partners to facilitate medical specialty consults, second opinions, the transmission of critical data to and from emergency units, and to provide decision support at the point of care where it is especially vital.

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UWB will greatly enhance our ability to develop "e-Health" applications, helping to improve the public's health, clinical performance, and administrative efficiency -- all of which as you know are high priorities of local, state, and federal public health agencies.

In short, we are excited about the prospects for UWB, and would look forward to working to help develop and implement useful population-based, clinical, and administrative applications for our constituency and the public they serve.

We hope that the Federal Communications Commission will favorably view the possibilities of UWB for healthcare in its rule making activities. Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Milne', with a long horizontal flourish extending to the right.

Thomas L. Milne
Executive Director